

United States Bankruptcy Court  
for the Eastern District of Pennsylvania

In Re: Chapter 13  
EDWARD J FORTESCUE SR  
JILL L. FORTESCUE

Debtor(s) Bankruptcy No.  
0912545 BIF

OBJECTION OF CHAPTER 13 TRUSTEE  
TO CONFIRMATION OF PLAN OF DEBTOR(S)

AND NOW comes, WILLIAM C. MILLER, ESQUIRE, chapter 13 standing trustee, to object to confirmation of the chapter 13 plan of debtor(s), because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or debtor(s) has/have failed to provide information, evidence, or corrections to the petition, schedules, statements or other documents filed by debtor(s) to enable the standing trustee to evaluate the Plan for confirmation, as follows:

Debtor(s) has/have failed to file an amended plan as directed at the meeting of creditors held under 11 U.S.C. Section 341(a).

The Plan is underfunded in that the total filed proofs of claim which are to be paid through the Plan exceed the value of the Plan.

WHEREFORE, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,  
/s/ William C. Miller

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William C. Miller, Esquire  
Chapter 13 Standing Trustee